

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

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Judge Jones

v.

1:17-CR-181

MARK JOHNSON

FILED
HARRISBURG, PA
JUN 16 2017
VH

**DEFENDANT'S REQUEST FOR PRETRIAL NOTICE PURSUANT TO
FED.R.CRIM.P. 12(b)(4)(B)**

AND NOW, comes Defendant, MARK JOHNSON, by and through counsel,
Daniel M. Myshin, Esq., pursuant to Fed.R.Crim.P. 12(b)(4)(B), and so that the
defense may have an opportunity to move to suppress evidence pursuant to
Fed.R.Crim.P. 12(b)(3)(C); hereby respectfully requests notice from the government
of the government's intention to use (in its evidence-in-chief at trial) any evidence
that the defendant may be entitled to discover under Fed.R.Crim.P. 16.

Respectfully submitted,

s/


Daniel M. Myshin

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CERTIFICATE OF SERVICE

AND NOW, this 15th day of June, 2017 the undersigned certifies that he is a person of suitable age and discretion to be competent to serve papers. Further, that in accordance with Local Rule 5.7, the undersigned served a copy of the attached document upon the following persons in the manner indicated below:

By personal service upon:

AUSA William A. Behe, c/o
United States Attorney's Office
228 Walnut Street
Harrisburg, Pennsylvania.

Respectfully submitted,

s/


Daniel M. Myshin

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